

ORIGINAL

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JUL 23 2020
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SVK

In re DMCA Subpoena to
YouTube, LLC

Case No.

DECLARATION OF HIROYUKI
NAKAJIMA

CV-20-80123-MISC

BY FAX

I, Hiroyuki Nakajima, declare and testify as follows:

1. I am an attorney duly licensed to practice law in Japan. I represent Izanagi Games Inc., a Japanese corporation, in the above-entitled proceeding and as such, I am authorized and qualified to make this declaration for and on its behalf, and I make this declaration for that reason.

2. Izanagi Games Inc. is seeking a subpoena pursuant to 17 U.S.C. § 512(h) to obtain information sufficient to identify the persons infringing its copyrighted works.

3. The purpose for which this subpoena is sought is to obtain the identity of the alleged infringers. Such information will only be used for the purpose of protecting rights under the Copyright Act (17 U.S.C. § 101, et seq.).


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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

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4 Executed on July 17, 2020.

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7 Hiroyuki Nakajima
8 Attorney for Izanagi Games Inc.
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Attorney for Izanagi Games Inc.

July 8,2020

Via Email

YouTube, LLC
Attn: Copyright Operations/ DMCA Complaints
901 Cherry Ave
San Bruno, CA 94066
Phone: 650-214-3010
Email: copyright@youtube.com

RE: NOTIFICATION OF COPYRIGHT INFRINGEMENT
(Pursuant to 17 U.S.C. § 512)

To whom it may concern:

I represent Izanagi Games Inc., a Japanese corporation (hereinafter called “Izanagi Games”), the representative of the two individual authors of the copyrighted works identified under the column entitled “Original Work” in Exhibit A attached to this notice (“Exhibit A”).

It has recently come to Izanagi Games’s attention that certain users of your services have unlawfully published and posted certain contents on your website located at www.youtube.com, more specifically identified under the column entitled “Infringing Work” in Exhibit A (referred to as the “Infringing Work”), corresponding to each of the Original Work identified in Exhibit A.

Izanagi Games has a good faith belief that the Infringing Work is not authorized by the copyright owner, its agent, or the law.

We demand that you immediately disable access to the Infringing Work and cease any use, reproduction, and distribution of the Original Work. Specifically, we request that you remove or disable the Infringing Work from www.youtube.com and/or any of your

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system or services.

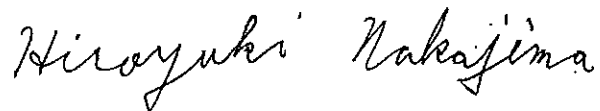
We also request a written assurance that you have fully complied with our request.

I declare that the information in this notice is accurate, and under penalty of perjury, that Shogakukan and I are authorized to act on behalf of the owner of the exclusive right of the Original Work that is infringed.

Your immediate response will be appreciated.

Very truly yours,

Hiroyuki Nakajima
Attorney at Law

A handwritten signature in black ink that reads "Hiroyuki Nakajima". The signature is written in a cursive, flowing style.

Youtube,LLC

July 8,2020

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Exhibit A.

	Title of Original Work	Author of Original Work	Original Work	Infringing Work	Title
1	Death come true	Izanagi Games Inc.	https://deathcometrue.com/	https://www.youtube.com/watch?v=rSguVh2itS8	デス
2	Death come true	Izanagi Games Inc.	https://deathcometrue.com/	https://www.youtube.com/watch?v=gtei0bBJQEs	Gam "18+ TRU